TABLE 1. AVERAGE ANNUAL EPA BURDEN AND COST

Activity	(A) EPA hrs/ Occurrence	(B) Occurrences/ plant/yr	(AxB=C) EPA hrs/ plant/yr	(D) Plants/ [a] year	(E=CxD) EPA hrs
New Sources: [a]					
Notification requirements	Not Applicable				
Initial performance test	Not Applicable				
Repeat performance test	Not Applicable				
Review test results	Not Applicable				
Existing Sources					
Review semi-annual exceedance rpt. [b]	5	2	10	14.3	143.3
Review annual rpt of formulation/ Method 24 [c]	5	1	5	43	215.0
Review report of change in operating parameters [d]	4	1	4	4.3	17.2
Method 25 A [e]	8	1	8	1	8

TOTAL ANNUAL HOURS   383.5

Travel Expenses [f] (1 person x 1 plant/yr x 1 day/plant x $85 per diem/day.person) + ($350 round trip/plant x 1 plant/yr) = $435.00
Salary Total: (383.5 hrs x $36.97/peson-hr) = $14,178
TOTAL ANNUAL COST= $14,613

Assumptions:

a   Assume there are 43 rubber tire manufacturing plants, one of which only mixes rubber compound. Also,that there will be no industry growth in the next three years.

b   Exceedance reports submitted as applicable. Assume one-third of sources (or 14.3) report exceedance reports for each six month.

c   Assume that all existing plants submit this annual Method 24 report. Further assume that 50 percent of the existing plants will continue to use HAP materials (VOC) in the spray at levels that meet the green tire VOC limitations in NSPS not needing add on control devices. The remaining plants use only water-based sprays.

d   Assume that 10 percent of all sources (or 4.3) will have to report changes on operational parameters.

e   Assume there are 3 plants that conduct Method 25 once a year to determine the VOC concentration in each stack, both entering and leaving the control device. Assume that the Agency will attend one test at a plant per year.

f   Assume an hourly labor rate at GS-12, Step 1 times a 1.6 benefits multiplication factor to account for government overhead expenses for a total of $36.97.